Remarks

Claim Rejections – 35 USC § 112

Pending claims 1, 8, 18, and 20 stand rejected under 35 USC 112, first paragraph, as failing to comply with the enablement requirement. This rejection is respectfully traversed in light of the amendments to the claims and the following remarks.

The Examiner had stated that the claimed limitation of "automatically analyzing" the collated semantic information elements was not supported in the specification. Instead, the Examiner argued, the specification supports that the analysis can be performed at run-time. Consequently, the claims are amended to remove the reference to "automatically" analyzing and to recite instead "at run-time" analyzing.

Claim Rejections – 35 USC § 103

Pending claims 1-9, 18, 20 and 22 stand rejected under 35 USC 103(a), as being unpatentable over Sciacca (US 6,760,761) in view of Vogel (US 7,461,078). This rejection is respectfully traversed in light of the following remarks.

The Applicant is grateful for the Examiner's acknowledgement, at p.4 of the Office Action, that "Sciacca does not explicitly cite the automatic analysis of semantics and automatic generation of adaptive software interface". Rather, as the Examiner has summarized, Sciacca teaches and is concerned with the adjustment of device configurations.

Claim 1 is now amended to further improve its clarity – and, in particular, to make the additional points of distinction from Sciacca more apparent. Consequently, claim 1 now refers to collating "the at least one semantic information element" of the first entity and "the corresponding at least one semantic information element" of the other entity. This makes explicit in the language of the claim the one-to-one correspondence between the

semantic information element(s) generated for the first entity and the semantic information element(s) generated for the second entity. Likewise, the following step in the method is clarified as "at run-time, analysing the at least one pair of said collated semantic information elements". It was previously implicit in claim 1 (though explicit in claim 8, for example, as well as p.48 of the specification), that the collation of elements results in a pair-wise association of the corresponding semantic information elements between the two entities. The amended wording of claim 1 therefore explicitly recognizes what was previously implicit.

Sciacca

With these amendments, it is submitted that the differences of the claimed subject-matter from the disclosure of Sciacca are even more readily apparent.

1. Sciacca cannot render claim 1 obvious at least because Sciacca does not disclose "generating structured meta-data... describing a characteristic of an interface capability of each of a first entity and at least one other entity".

The Examiner asserts, in the "Response to Arguments" section of the Office Action, that col.5, lines 41-52 of Sciacca discloses "how this data [providing at least one semantic information element describing a characteristic of an interface capability of an entity] is collected for the client-end device and stored in the configuration database".

With respect, this is simply not supported by the cited passage. This passage describes the input inspection engine 450 of the device configuration database 310. The engine "validates inputs from external entities". For example, it may perform checks to ensure that invalid data is not entered by an operator into the configuration database 420.

The "external entities" of the cited passage of Sciacca include "customers, configuration novices and experts". Therefore, the Examiner is apparently asserting that this passage discloses "structured metadata providing at least one semantic information element

describing a characteristic of an interface capability of" a customer, configuration novice or expert. It is not known what the Examiner means by a "semantic information element describing a characteristic of an interface capability of" a human being; but it is safe to say that the cited passage of Sciacca does not disclose anything of the sort.

This merely underlines the inconsistency of the Examiner's interpretation with what is taught by Sciacca. The cited passage of Sciacca discloses absolutely nothing about the "interface capability" of the external entities. It describes an input engine for validating inputs.

2. Sciacca cannot render claim 1 obvious at least because Sciacca does not disclose "collating the at least one semantic information element of said first entity with the corresponding at least one semantic information element of said at least one other entity".

The amended wording of claim 1 emphasizes the fact that Sciacca does not disclose generating and collating corresponding semantic information elements for two entities that wish to establish communication with one another. Even if the Examiner were correct that Sciacca discloses generating a semantic information element of some kind, describing an interface capability of the "other" entity (the "client-end" devices of Sciacca), the Examiner must surely at least concede that the cited passages do not disclose generating and then collating corresponding metadata describing the interface capability of both devices.

Unless the same information elements are collected for both devices, there can be no possibility of collating corresponding elements.

3. Sciacca cannot render claim 1 obvious at least because Sciacca does not disclose "at run-time, analysing the at least one pair of said collated semantic information elements to establish the extent to which the interface capabilities of said entities are compatible".

Since Sciacca does not disclose generating metadata or collating corresponding semantic information elements for any "other entity", it also cannot disclose analysing a pair of collated information elements (one for each entity).

If the Examiner believes otherwise, to assist the Applicant, the Applicant respectfully requests the Examiner to identify explicitly what collated pair of semantic information elements is disclosed by Sciacca and how they are "[analysed] ...to establish the extent to which" interface capabilities of the two entities are compatible.

4. Sciacca cannot render claim 1 obvious at least because Sciacca does not disclose "automatically generating in accordance with said established compatibility an adaptive software interface for said entities".

The Examiner has acknowledged as much in the most recent Office Action.

Consequently, Sciacca does not properly disclose even a single one of the steps in the method of amended claim 1. This is unsurprising, since Sciacca is concerned with quite a different problem – namely, as the Examiner has correctly identified, "the adjustment of device configurations".

Vogel

The Examiner asserts that "Vogel also teaches a device configuration adjustment system". In fact, Vogel describes an interface system for accessing data in a database (Vogel: title; background of the invention). It is quite unlike Sciacca, and completely unrelated to the present invention.

In the system of Vogel, a user wishing to create or modify a database first constructs a "dictionary of interface-definition descriptors" (Vogel, col.3, lines 64-67). In response, a (for example, graphical) user interface for the database is automatically adapted "in a

conventional manner" using the chosen descriptors in the dictionary (col.4, lines 5-7). A data dictionary for the structural definition of the database can also be automatically updated to adapt the structure to the programmed access interface (col.4, lines 11-6). The purpose of this is to save the user time "during the development or modification of an application" (col. 4, lines 8-11).

None of the teaching of Vogel enables two devices with different interface capabilities to communicate (cf. claim 1). Nothing in Vogel is concerned with the establishment of an adaptive software interface between two entities at run-time. Indeed, Vogel does not even mention that different devices need to communicate with one another (contrary to the Examiner's assertion at the bottom of p.4 of the Office Action). Vogel discloses none of the features of claim 1.

Consequently, Vogel can remedy none of the deficiencies of Sciacca (even if there were to be a meaningful way of, and plausible motivation to, combine the two references – which Applicant submits there is not).

The foregoing remarks show that Sciacca fails to disclose each of the recited limitations in amended claim 1. Vogel does nothing to remedy these deficiencies. Accordingly, it is not possible to make a prima facie case demonstrating the obviousness of claim 1 in light of these two references.

Independent claims 8, 18, and 20

Corresponding amendments have been made to claims 8, 18, and 20. For brevity, the arguments will not be repeated again. Of the arguments made above relating to the patentability of claim 1:

- Numbered points 1 to 3 apply equally to claim 8;
- All of points 1 to 4 apply identically to claim 18;
- Likewise, all four points apply identically to claim 20.

Claims 8, 18, and 20 are thus submitted to be allowable for at least these reasons.

The remaining dependent claims are allowable at least by virtue of their dependence from an allowable independent claim.

In view of the fact that all of the Examiner's comments have been addressed, further and favorable reconsideration is respectfully requested.

A needed Petition for Extension of Time is also submitted herewith.

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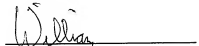
Respectfully submitted,



William M. Lee, Jr.
Registration No. 26,935
Barnes & Thornburg LLP
P.O. Box 2786
Chicago, Illinois 60690-2786
(312) 214-4800
(312) 759-5646 (fax)